



MEMO ENDORSED

December 20, 2018

VIA ECF

The Honorable Judge Edgardo Ramos
United States District Court
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square, Courtroom 619
New York, NY 10007

The application is x granted
 denied

A handwritten signature in blue ink, appearing to read "Edgardo Ramos", is written over a horizontal line.

Edgardo Ramos, U.S.D.J.
Dated: 12/20/2018
New York, New York

James H. Donoian
Partner
T. 212-609-6817
F. 212-416-7688
jdonoian@mccarter.com

**Re: Robert G. Lopez v. Trust Religion Sales, LLC, et al.,
Case No. 1:18-cv-10595 (ER)**

Dear Judge Ramos:

McCarter & English, LLP
Worldwide Plaza
825 Eighth Avenue
31st Floor
New York, NY 10019-7475
T. 212.609.6800
F. 212.609.6921
www.mccarter.com

Defendant Fox and Jane, LLC ("Fox and Jane") respectfully submits this letter pursuant to Rule 1.E of Your Honor's Individual Practices in Civil Cases to request an extension of Fox and Jane's deadline to respond to Plaintiff Robert G. Lopez's First Amended Complaint, which was served on Fox and Jane on November 30, 2018. Fox and Jane's response is currently due on December 21, 2018.

Fox and Jane requests this extension in order to allow time for it to investigate the claims and allegations made against Fox and Jane in this lawsuit, and to prepare a response to the First Amended Complaint. There have been no previous requests made for an extension of time to respond.

We have consulted with Plaintiff Mr. Lopez, who is representing himself *pro se*, and he has consented to this extension. The parties have agreed to extend Fox and Jane's deadline to respond to the First Amended Complaint until January 14, 2019.

We thank Your Honor for your consideration.

Respectfully Submitted,

s/James H. Donoian

James H. Donoian

cc: All Counsel of Record (via ECF)

BOSTON

HARTFORD

STAMFORD

NEW YORK

NEWARK

EAST BRUNSWICK

PHILADELPHIA

WILMINGTON

WASHINGTON, DC